



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 6, 2022

BY ECF

The Honorable Lorna G. Schofield
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Dennis*, 20 Cr. 623 (LGS)

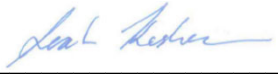
Dear Judge Schofield:

The Government respectfully submits this letter to inform the Court of information that the Government recently learned that further demonstrates the need for the current bail conditions and counsels against the defendant's second request to modify the conditions of his pretrial release. In seeking to have his location monitoring bracelet and home detention conditions removed, the defendant argues, among other things, that he has respected the bail condition that prohibits him from having any contact with any victims or employees of his former law firm (the "Firm"). (Dkt. No. 34 at 3, 6; Dkt. No. 40 at 1-2.) The defendant, however, as recently as May 4, 2022, has been sending harassing emails to at least one third party connected to the Firm. Those emails are exactly the kinds of emails that form, in part, the basis for the cyberstalking charges in this case. For example, the defendant has sent articles about the size of the world Jewish population and a recent Nazi rally in Florida to the third party, who is Jewish. While not a technical violation of the no-contact condition, these emails undermine the purpose and spirit of the condition and are cause for concern. If the Court wishes to see the emails, the Government respectfully requests that they be submitted under seal to protect the privacy of the third party.

For the foregoing reasons, and those set forth in the Government's prior letters (Dkt. Nos. 19 and 39) and in the Court's January order (Dkt. No. 27), the defendant's renewed request for a modification of the most significant conditions of his pretrial release should be denied.

Respectfully submitted,

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